

## RESPONSIVENESS SUMMARY

To EPA Comments on Proposed Title V Permit  
During Official 45-Day EPA Review Period  
(4/21/1999 - 6/4/1999)  
for  
**Air Quality Control Permit No 1000105**  
Tucson Electric Power Company  
Springerville Generating Station

The followings are responses to EPA' s comments of June 3, 1999:

*Comment 1: EPA believes that more specific requirements for baghouses should be added to the permits. For units equipped with baghouses, operation of these controls should be required (and explicitly stated in the permit) at all times when the units are in operation, in accordance with manufacturer's recommendation for use. In addition to these requirements, EPA recommends weekly inspections of operation and maintenance, including a test for tears and holes, and associated record keeping and reporting requirements.*

Response: For the boiler baghouse, periodic monitoring for particulate matter consists of two parts. First the permittee is required to operate the baghouse in accordance with manufacturer' s specifications. Second, the permittee is required to monitor opacity from the baghouse utilizing its Continuous Opacity Monitor (COM) to assure correct operation. Correct operation is determined by comparing COM output to a baseline opacity level that represents a proper operating baghouse. This approach is similar to what other states have utilized for periodic monitoring. ADEQ believes that this periodic monitoring is sufficient and no change to the permit has been made.

*Comment 2: Not related to Springerville Station.*

*Comment 3: Not related to Springerville Station*

*Comment 4: In order to clarify the sources' obligation with respect to submitting semiannual compliance certifications, we suggest that standard condition VII.B in Attachment A (General Provisions) specify that copies of all compliance certifications be sent to EPA Region 9.*

Response: The suggested change has been made.